

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL FOSTER,

Plaintiff,

vs.

KEYSTONE FREIGHT CORP,

Defendant.

: **CIVIL ACTION NO. 2:11-cv-02476**
:
:
:
:
:
:
:
:
:

DEFENDANT'S PROPOSED VERDICT SHEET

We, the jury in the above entitled action, return the following answers to the questions of fact presented to us.

SECTION A

1. Do you find by a preponderance of the evidence that Plaintiff suffered from a disability? ☐ YES ☐ NO

If your answer to Question No. 1 is "YES," proceed to Question No. 2. If your answer to Question No. 1 is "NO," then you must find for Defendant and proceed to Section No. B.

2. Do you find by a preponderance of the evidence that Plaintiff's disability was the sole motivating factor in the decision to terminate Plaintiff's employment?

☐ YES ☐ NO

If your answer to Question No. 2 is "YES," proceed to Question No. 3. If your answer to Question No. 2 is "NO," then you must find for Defendant and proceed to Section B.

3. What amount of money will compensate Plaintiff for damages, if any, caused by Defendant's disability discrimination against Plaintiff? In answering this question, you must subtract from any lost wages and/or benefits any earnings or benefits Plaintiff has obtained, or

could have obtained had he exercised reasonable diligence following his termination from Defendant.

- a. Lost wages \$ _____
- b. Lost benefits \$ _____

SECTION B

The Foreperson should sign and date the verdict slip below and the jury should return to the Courtroom.

Foreperson

Date